

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) NANCY MORRISON

Plaintiff,

v.

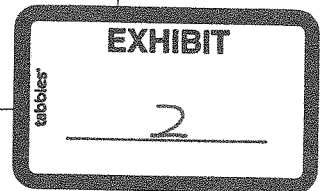
(1) CHARTIS PROPERTY CASUALTY CO., a foreign
corporation,

Defendant.

Case No. 13-CV-116-JED-PJC

PRIVILEGE LOG

Bates Range	Document Type	Date	Author (Atty Author Denoted by *)	Recipients	General Subject Matter	Privilege Asserted
Claim File 379-385	Email/letter/summary	12/28/12	Dan S. Folluo*	Brittan Reed	Report on underlying litigation and summary opinion of Plaintiff's deposition testimony.	Attorney/client privilege and work product.
386-423	Email and letter	11/6/12	Dan S. Folluo*	Brittan Reed	Report and opinion on underlying litigation, legal advice concerning state of law under UM statute and subrogation; Plaintiff's deposition testimony.	Attorney/client privilege and work product.



424-425	Email and letter	9/26/12	Dan S. Folluo*	Brittan Reed	Legal advice concerning medical record authorizations and independent medical reviews.	Attorney/client privilege and work product.
426-428	Email and letter	9/10/12	Dan S. Folluo*	Brittan Reed	Report and opinion on underlying litigation; legal advice concerning intervention.	Attorney/client privilege and work product.
429-437	Email/letter/pleadings	8/21/12	Dan S. Folluo*	Brittan Reed	Report and opinion on underlying litigation; legal advice concerning insurer's right to subrogation.	Attorney/client privilege and work product.
438-439	Email and letter	8/22/12	Dan S. Folluo*	Brittan Reed	Legal advice concerning intervention rights, litigation discovery and subrogation.	Attorney/client privilege and work product.
445-450	Email and letter	8/16/12	Dan S. Folluo*	Brittan Reed	Legal opinion and advice concerning state of case law relative to UM subrogation and litigation discovery issues.	Attorney/client privilege and work product.
451-452	Email and letter	8/15/12	John H. Tucker*	Brittan Reed and Dan S. Folluo*	Retention of law firm to provide legal advice.	Attorney/client privilege and work product.
453-473	Email/report/photographs	8/13/12	Brittan Reed	Brian Mack	Request for documents to assist in defense anticipated lawsuit.	Work product.
735	Email	8/13/12	John H. Tucker*	Brittan Reed	Response to request for legal advice.	Attorney/client privilege and work product.

891-895	Email/letter and attachment	1/31/13	Mary L. Henderson on behalf of Dan S. Folluo*	Brittan Reed	Medical records, retrieval issues.	Attorney/client privilege and work product.
923	Claim note entry and email	2/25/13	Brittan Reed/ Dan S. Folluo*	Brittan Reed	Outside legal counsel's report and opinion on underlying litigation.	Attorney/client privilege and work product.
923	Claim note entry - copying email from legal counsel	2/21/13	Brittan Reed/ Dan S. Folluo*	Brittan Reed/ Randall E. Long*/Mary Henderson/ Teresa Ray	Report and opinion on underlying litigation, legal advice concerning right to subrogation.	Attorney/client privilege and work product.
924	Claim note entry - copying email from legal counsel	2/19/13	Brittan Reed/ Dan S. Folluo*	Brittan Reed	Report on underlying litigation.	Attorney/client privilege and work product.
924	Claim note entry	1/7/13	Brittan Reed	-	Discussion of payment of expenses to outside legal counsel	Work product.
924	Claim note entry	12/17/12	Brittan Reed	-	Summary of legal advice and statements by outside legal counsel relative to medical records authorization.	Attorney/client privilege and work product.
925	Claim note entry - copying email from defense counsel	12/17/12	Brittan Reed/ Dan S. Folluo*	Brittan Reed	Report and opinion on underlying litigation.	Attorney/client privilege and work product.
925	Claim note entry	12/10/12	Brittan Reed	-	Summary of outside legal counsel's report and opinion regarding underlying litigation and advice of medical records authorization.	Attorney/client privilege and work product.

925	Claim note entry	12/3/12	Brittan Reed	-	Entry regarding involvement of defense counsel and monitoring of underlying lawsuit, status of same.	Attorney/client privilege and work product.
925-926	Claim note entry - copying email from outside legal counsel	11/7/12	Brittan Reed/ Dan S. Folluo*	Brittan Reed	Report and opinion regarding underlying lawsuit, legal advice relative to liability limit tenders and subrogation.	Attorney/client privilege and work product.
926	Claim note entry	11/6/12	Brittan Reed	-	Summary of discussion with outside legal counsel relative to his opinion of underlying litigation.	Attorney/client privilege and work product.
926	Claim note entry	11/6/12	Brittan Reed	-	Email to outside legal counsel concerning legal advice on closing claims and report/opinion on underlying litigation.	Attorney/client privilege and work product.
926	Claim note entry - copying email from outside legal counsel	9/26/12	Brittan Reed/ Dan S. Folluo*	Brittan Reed	Legal advice concerning medical records authorization and independent medical reviews.	Attorney/client privilege and work product.
926	Claim note entry	9/25/12	Brittan Reed	-	Summary of discussion with outside legal counsel relative to medical records authorization, independent medical	Attorney/client privilege and work product.

926-927	Claim note entry – copying email from outside legal counsel	9/10/12	Brittan Reed/ Dan S. Folluo*	Brittan Reed	examinations and state of the law relative to insurer bad faith.	Attorney/client privilege and work product.
927	Claim note entry	8/30/12	Brittan Reed	-	Legal counsel's report and opinion on underlying litigation, independent medical examinations and legal advice concerning insurer's right to intervention in underlying litigation.	Attorney/client privilege and work product
930	Claim note entry	8/20/12	Brittan Reed	-	Summary of discussion with legal counsel regarding claim and communication with insured's counsel	Attorney/client privilege and work product.
930	Claim note entry	8/15/12	Brittan Reed	-	Summary of discussion with outside legal counsel concerning legal rights to subrogation in UIM context.	Attorney/client privilege and work product.
930	Claim note entry	8/13/12	Brittan Reed	-	Summary of discussion with outside legal counsel concerning state of case law on uninsured motorist insurance, insurer bad faith and subrogation.	Attorney/client privilege and work product.

930-931	Claim note entry	8/13/12	Brittan Reed	-	firm for legal advice. Summary of discussion with outside legal counsel, John H. Tucker regarding status of Oklahoma UM law and status of insurer bad faith law.	Attorney/client privilege and work product.
931	Claim note entry	8/13/12	Brittan Reed	-	Summary of discussion with attorney John H. Tucker and legal advice regarding state of UM law and bad faith.	Attorney/client privilege and work product.
931	Claim note entry	5/15/12	Brittan Reed	-	Setting Reserves	Confidential/ Proprietary
934	Claim note entry	9/9/11	Brittan Reed	-	Setting Reserves	Confidential/ Proprietary
936	Claim note entry	9/1/11	Brittan Reed	-	Setting Reserves	Confidential/ Proprietary
937	Claim note entry	8/31/11	Brittan Reed	-	Setting Reserves	Confidential/ Proprietary
939	Claim note entry	8/23/11	Brittan Reed	-	Setting Reserves	Confidential/ Proprietary
CHARTIS - 841	Reserves transaction history	No date	(computer report)	-	Setting Reserves	Confidential/ Proprietary

Respectfully submitted,



By

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